

January 30, 2017

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Initial Comments in Support of Petition for Rule Making (MB Docket 16-410)

Meredith Corporation and Raycom Media, Inc. (together, "Commenters") hereby SUPPORT the above-referenced Petition to allow for the sole use of online sources for recruitment under the Commission's Equal Employment Opportunity rules. Meredith's Local Media Group includes 17 owned or operated television stations reaching 11 percent of U.S. households. Raycom owns and/or provides services for 63 television stations and 2 radio stations in 42 markets, covering over 14% of U.S. households. The Commenters regularly recruit for hundreds of positions each year.

The Commenters support the Petition because 1) it will erase a false dichotomy between "brick and mortar" sources that use the Internet to reach their audiences and "online-only" sources that do the same, 2) it will allow for more efficient record keeping and therefore save stations' and the Commission's staff efforts in random EEO audits, and 3) it matches the Commission's efforts in other areas (such as the online public file and other electronic filing efforts).

First, the Commenters note that the distinction between a recruitment source that has a brick and mortar presence (such as a university or state agency) versus one that does not (such as an online classified service or online publication) ignores that in 2017 both "brick and mortar" and "online only" entities use the Internet to reach their audiences. Universities and state agencies use online job banks, email blasts, and websites to reach their stakeholders. If they did not, they would become quickly irrelevant. In the same way, online classifieds and other publications compete directly with newspapers (which are becoming fewer and farther between) online for eyeballs. Much like trying to say that Walmart does not compete with Amazon, it is untenable to argue that "brick and mortar" institutions are not competing in the same space as "online only" sources for job postings.

Second, online processes for distributing job postings are simpler and more efficient to maintain in electronic form. Rather than type, print, and mail source information, which must then must be filed or scanned in, fully electronic processes can be fully automated, including automated record keeping. In line with the first point above, while many "brick and mortar" institutions accept job postings by email, not all of them do, and it would be productive for a licensee to be able to choose to exclude sources that would add to paperwork burdens for the licensee and the Commission in favor of more streamlined options.

Finally, the Commission itself has moved almost all of its processes online. These comments are filed on ECFS. Issues and programs lists, once only available on paper, are now available on the FCC.gov online public file. Notifications previously served through the Commission's mailroom are now submitted through the Licensing and Management System. It is time for the Commission to bring its EEO rules in line with its commitment to twenty-first century electronic communication.

For the reasons expressed above, Meredith Corporation and Raycom Media, Inc. SUPPORT the Petition for Rule Making in the above-referenced docket.

Very truly yours,

/s/

Joshua N. Pila
General Counsel
Local Media Group
Meredith Corporation

/s/

Rebecca Bryan
Senior Vice President & General Counsel
Raycom Media, Inc.